

Hearing Date and Time: June 25, 2009 at 9:45 a.m.

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Committee of Consumer Victims of General Motors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
GENERAL MOTORS CORP., <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**EVIDENCE AND WITNESS LIST OF AD HOC COMMITTEE OF CONSUMER
VICTIMS OF GENERAL MOTORS FOR THE DEBTORS' MOTION PURSUANT TO
11 U.S.C. §§105, 363(b), (f), (k), and (m), AND 365 AND FED R. BANKR. P. 2002, 6004,
AND 6006, TO (I) APPROVE (A) THE SALE PURSUANT TO THE MASTER SALE
AND PURCHASE AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS LLC, A
U.S. TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF LIENS,
CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS; (B) THE ASSUMPTION
AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED
LEASES; AND (C) OTHER RELIEF; AND (II) SCHEDULE SALE APPROVAL
HEARING**

The Ad Hoc Committee of Consumer Victims of General Motors (the "Ad Hoc
Consumer Committee"), by and through its undersigned counsel, by way of evidence and
witness list for the Debtors' Motion Pursuant to 11 U.S.C. §§105, 363(b), (f), (k), and (m), and
365 and Fed R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) the Sale Pursuant to the

Master Sale and Purchase Agreement With Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear Of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing (the “Sale Motion”), hereby states:

WITNESSES

The Ad Hoc Consumer Committee may call as adverse witnesses Frederick Henderson, CEO of General Motors Corp. (“GM”) and Harry Wilson of the U.S. Auto Task Force, live or by deposition. The Ad Hoc Committee reserves its right to cross-examine witnesses called live or declaration or affidavit by the Debtors or any other party. The Ad Hoc Consumer Committee also reserves its right to amend or supplement this list upon review of discovery responses just now being provided, or otherwise should the need present itself.

EXHIBITS

The Ad Hoc Consumer Committee may use the Affidavit of Frederick Henderson (Docket No. 21) and any amendments or supplements thereto, the Master Transaction Agreement and any of the documents contained on the Debtors’ exhibit list at the hearing on the Sale Motion. On June 24, 2009, the Debtors produced hundreds of thousands of pages of documents and the U.S. Auto Task Force produced thousands of pages of documents. The Ad Hoc Committee reserves its right to amend or supplement this list after it has had an opportunity to review such documents.

DEPOSITION DESIGNATIONS

The depositions of Michael Raleigh of GM, Frederick Henderson of GM and Harry Wilson of the U.S. Auto Task Force are scheduled to be conducted on June 27, 28 and 29

respectively. The Ad Hoc Committee reserves the right to designate all or portions of the transcripts of such depositions.

SCHNADER HARRISON SEGAL
& LEWIS LLP

Dated: June 25, 2009

By: /s/ Benjamin P. Deutsch
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- and -

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